

ROTHMAN, SCHNEIDER, SOLOWAY & STERN, LLP

Attorneys at Law  
100 Lafayette Street, Suite 501  
New York, NY 10013

Franklin A. Rothman  
Jeremy Schneider  
Robert A. Soloway  
David Stern

Tel: (212) 571-5500  
Fax: (212) 571-5507

\_\_\_\_\_  
Rachel Perillo

March 31, 2023

**By ECF**

The Honorable Edgardo Ramos  
United States District Judge  
Southern District of New York  
40 Foley Square  
New York, New York 10007

Re: United States v. Irina Dilkinska  
17 Cr. 630 (ER)

Dear Judge Ramos:

I represent Irina Dilkinska, the defendant in the above-referenced matter, having been appointed on March 21, 2023 pursuant to the Criminal Justice Act. This letter is respectfully submitted to request that your Honor authorize the appointment of my associate, Rachel Perillo, Esq., as associate counsel in this matter to assist me in various aspects of the case which are described in further detail below.

Ms. Perillo is a 2014 New York Law School graduate and is admitted to practice before this Court. She regularly assists me and other partners in my law office in CJA cases and has been assigned as associate counsel in criminal matters in the Southern and Eastern Districts of New York. It is expected that her assistance will be needed in Ms. Dilkinska's case for various reasons. This is a complex matter involving an international \$4 billion cryptocurrency fraud scheme. I anticipate that discovery will be voluminous and will include but not be limited to, search warrant returns, pen register returns, subpoena returns from domestic and international financial institutions, phone companies, email service providers and other sources. Other defendants in this case have already pleaded guilty or been convicted at trial, which will require thorough review of the record in those cases. Ms. Perillo's assistance will be needed to review these materials. Additionally, Ms. Dilkinska is a Bulgarian citizen who was extradited to the United States pursuant to the charges in this case, and she has no family in this country. I will therefore need Ms. Perillo's assistance to maintain communication with Ms. Dilkinska, including visiting her at the Essex County Correctional Center, and maintain communication with her family in Bulgaria, since she is not able to make international phone calls from jail.

Hon. Edgardo Ramos  
March 31, 2023  
Page Two

If the Court grants this application, it is requested that Ms. Perillo be approved at the CJA rate of \$120.00 per hour for a period of 100 hours, nunc pro tunc to March 22, 2023. Should additional hours be sought, an application will be submitted to the Court seeking approval.

The Court's time and attention to this matter is appreciated.

Respectfully submitted,  
/s/  
Jeremy Schneider